OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE V OPERATING PERMIT
Part 1 of 2

Western Region
4026 Fairview Industrial Drive SE
Salem, OR 97302
Telephone (503) 378-8240

Issued in accordance with the provision of
ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Swanson Group Mfg. LLC
P.O. Box 250
Glendale, OR 97442

PLANT SITE LOCATION:

303 Mehlwood Lane
Glendale, OR 97442

INFORMATION RELIED UPON:

Application Number: 27408
Received: 7/2/2013

LAND USE COMPATIBILITY STATEMENT:

Issued by: Douglas County Planning
Dated: 06/05/96

ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY

Claudia J. Davis
Claudia Davis, Western Region Air Quality Manager

JUN 12 2017
Date

Nature of Business:		SIC	NAICS
Plywood Manufacturer	Primary	2436	321212
Fuel Burning Equipment	Supporting	4961	221330

RESPONSIBLE OFFICIAL

Title: Vice President of Manufacturing

FACILITY CONTACT PERSON

Name: Jay Yates
Title: Corporate Steam Systems Manager
Phone: (541) 731-0461

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
EPA	US Environmental Protection Agency
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040
HCFC	Halogenated Chloro-Fluoro-Carbons
ID	Identification number or label
I&M	Inspection and maintenance
NA	Not applicable
NO_x	Nitrogen oxides
O2	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM_{10}	Particulate matter less than 10 microns in size
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
SERP	Source emissions reduction plan
SO_2	Sulfur dioxide
ST	Source test
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]

2. All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA, and citizens under the Clean Air Act, except as specified below:

   2.a. Conditions 6, 7, 8, G5, and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [OAR 340-218-0060]

3. The facility has two operating scenarios.

   3.a. In the base operating scenario #1, the exhaust gases from the three veneer dryers are ducted to the regenerative thermal oxidizer (RTO).

   3.b. In operating scenario #2, the exhaust gases from the veneer dryers are ducted to the combustion chamber of 1PH.

   3.c. Recordkeeping: The permittee shall contemporaneously record changes from one alternative operating scenario to another. The records shall be made available or shall be submitted upon request by DEQ. [OAR 340-218-0140(1)(c)]

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

4. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)(a)(B)]:

Table 1 Emission Units

Emission Unit Description	EU ID	Pollution Control Device Description*	PCD ID
Powerhouse Operations Dutch oven hog fuel boiler	1PH	Multiclones and ESP	1CD and ESP
Log Vats	VAT	None	NA
Materials Handling (Fugitive PM only) FL1 Hog fuel pile-fuel loader HFP2 Hog fuel from loader ~~HFR1 Hog fuel truck unloading ramp~~ BD1a,b,c,d Log conveyors BC1a,b,c,d Bark conveyors L1a,b,c,d Log process chip conveyors V1a,b,c,d Veneer lath chip conveyors B2 Hog fuel bark bins B3,4,5 Chip loading bins B6 Sander dust truck loading bin B7 Chip fines/sawdust loading bins B8 Ply trim loading bin FP2 Auxiliary pile L4 Hand pick	2MT	None	NA

L7 Rechipper			
Adhesives, paint and chemicals	3ADH	None	NA
Columbia Plywood Press #1	P1	None	NA
Columbia Plywood Press #2	P2	None	NA
Williams and White Plywood Press #3	P3	None	NA
Glue Mixer and Tanks	MX1	None	NA
Pneumatic Conveyors CY1 Chip fines cyclone #1 CY2 Chip fines cyclone #2 CY3 Veneer saw cyclone #3 CY4 T&G saw cyclone #4 CY5 Trim saws cyclone #5 TB1 Target box #1 TB2 Target box #2 TB3 Target box #3 BP1 Open blow pipe F8 Exhaust fan	4CON	None	NA
Sander dust pneumatic conveyor		Baghouse	BH1
Ply trim conveyor		Baghouse	BH2
Sander	1SAN	Baghouse	BH3
Veneer Dryer DR1	5VD	RTO or 1PH and ESP	RTO or 1PH & ESP
Veneer Dryer DR2			
Veneer Dryer DR3			
Veneer Dryer Fugitives	5VDa	None	NA
Wood Residual Chips	WRC	none	NA
Emissions units 2MT (except FL1, HFP2, HFR1, B2, and FP2), P1, P2, P3, 4CON, 1 SAN, aud AI PM from DB1, V2a,b, V3a,b,c, and SC1,2,3 for compliance with the emissions limitations in OAR 340-234-0510(2). Emission limitations established herein and stated in terms of pounds per 1000 square feet of production shall be computed on an hourly basis using the maximum eight-hour production capacity of the plywood presses.	PLY	NA	NA
Gasoline Dispensing Facilities	GDF	Submerged fill	NA
Plant Traffic on Paved Roads	6WE	Sweeping/Watering	NA
AGGREGATE INSIGNIFICANT ACTIVITIES			
$PM/PM_{10}/PM_{2.5}$ and VOC only	7AI	None	NA

*Cyclones listed in this table are not actually pollution control devices but are instead material handling devices. If a cyclone is followed by a baghouse, the baghouse is the control device.

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Table 2 Summary of Facility Wide Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0210	5	Fugitive emissions	Minimize	NA	NA	8
340-208-0300	6	Air contaminants	No nuisance	NA	NA	8
340-208-0450	7	PM >250μ	No fallout	NA	NA	8
40 CFR Part 68	9	Risk management	Risk management plan	NA	NA	9

5. Applicable Requirement: The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne.

   5.a. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210(1)]

      5.a.i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

      5.a.ii. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;

      5.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water or chemicals are not sufficient to prevent particulate matter from becoming airborne;

      5.a.iv. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;

      5.a.v. Adequate containment during sandblasting or other similar operations;

      5.a.vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and

      5.a.vii. Prompt removal from paved streets of earth or other material that does or may become airborne.

   5.b. Upon request by DEQ, the permittee must develop a fugitive emission control plan for approval by DEQ if the above precautions are not adequate, and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period. [OAR 340-208-0210(3)]

6. Applicable Requirement: The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] This condition is enforceable only by the State.

7. Applicable Requirement: The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450] This condition is enforceable only by the State.

8. Monitoring Requirements for Conditions 5, 6, and 7: [OAR 340-218-0050(3)(a)(C)]

8.a. The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible.

8.b. At least quarterly, for a minimum period of 30 minutes, the permittee shall visually survey the plant for any sources of excess fugitive emissions in accordance with EPA Method 22. For the purposes of this survey, excess emissions are considered to be any visible emissions that leave the plant boundaries from sources or activities within the facility for more than 18 seconds in a six-minute period. The person conducting the observation does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions.

8.c. If excess fugitive emissions are identified, the permittee shall:

8.c.i Immediately take corrective action to minimize the excess fugitive emissions; and,

8.c.ii. Maintain records of the fugitive emissions surveys and corrective action (if necessary).

8.d. If the observer is unable to conduct the tests and/or surveys due to visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer must note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to make the tests daily until a valid observation period is completed.

8.e. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys required by Condition 8.b, including date, time, observer, observations, results, and any corrective actions taken.

8.f. This condition is enforceable only by the State.

Accidental Release Prevention

9. Applicable Requirement: If applicable, the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

HOG FUEL BOILER (1PH)

Table 3 Snmmary of Requirements for Emissions Unit 1PH

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(5)	10	Visible emissions	40%/20% opacity	6-minute block average	NA	11
340-228-0210(2)(a)(A)	12	PM	0.10 gr/dscf @ 12% CO_2	Avg. of 3 test runs	13	14-18
40 CFR Part 63 Subpart JJJJJJ	19 and Part 2	HAP	Operate boiler in compliance with requirements of JJJJJJ	NA	NA	Part 2

10. Applicable Requirement: The permittee must comply with the following visible emission limits for emissions unit 1PH: [OAR 340-208-0110(5)]

10.a. Any visible emissions may not equal or exceed:

10.a.i. An average of 40 percent opacity through December 31, 2019, with the exception that visible emissions may equal or exceed an average of 40 percent opacity for up to two independent six-minute blocks in any hour, as long as the average opacity during each of these two blocks is less than 55 percent; and

10.a.ii. An average of 20 percent opacity on or after January 1, 2020, with one or more of the following exceptions:

10.a.ii.A. Visible emissions may equal or exceed an average of 20 percent opacity for up to two independent six-minute blocks in any hour, as long as the average opacity during each of these two six-minute blocks is less than 40 percent;

10.a.ii.B. Visible emissions may equal or exceed an average of 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all six-minute blocks during grate cleaning operations, provided the grate cleaning is performed in accordance with a grate cleaning plan approved by DEQ.

10.b. The visible emission standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 10.b.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by:

10.b.i. EPA Method 9; or

10.b.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR Part 60; or

10.b.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9. [OAR 340-208-0110(2)]

11. Monitoring Requirement: At least once per quarter, the permittee shall conduct EPA Method 9 visible emissions tests on emissions unit 1PH. Should a test exceed the applicable standard, corrective action will be initiated within one (1) hour to bring the source into compliance with the applicable requirement and the monitoring frequency shall revert to weekly for a minimum of four (4) consecutive weeks. If the results of the four weekly tests are all less than the applicable standard, the test frequency may be the same as before the exceedauce occurred. [OAR 340-218-0050(3)(a)(C)]

11.a. If the observer is unable to conduct the tests due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three (3) attempts to conduct the tests at approximately 2-hour intervals throughout the day during daylight hours. The permittee shall attempt to make the test daily until a valid observation period is completed.

11.b. Recordkeeping: The permittee must maintain records of all visible emissions tests, including date, time, observer, observations, results, type of fuel being burned, and any corrective actions taken.

12. Applicable Requirement: The permittee may not emit particulate matter emissions from emissions unit 1PH in excess of 0.10 grains per dry standard cubic foot corrected to 12% CO_2:. Compliance with the emission standard in this condition is determined using ODEQ Method 5, or an alternative method approved by DEQ. [OAR 340-228-0210(2)(a)(A)]

13. Testing Requirement: 1PH will be tested at least once during the permit term for PM emissions (gr/dscf corrected to 12% CO_2, pounds per hour, and pounds per 1000 pounds steam), CO emissions (pounds per hour and pounds per 1000 pounds steam), aud NO_x emissions (pounds per hour and pounds per 1000

pounds steam). [OAR 340-218-0050(3)(a)(C)]

13.a. Test Methods:

13.a.i. EPA 201A and 202 and EPA Methods 1 through 4 and ODEQ Method 5 for PM, EPA Method 10 for CO, and EPA Method 7E for NO_x.

13.a.ii. Visible emissions shall be measured concurrently with each PM test run using EPA Method 9.

13.a.iii. The source tests shall be conducted at 1PH maximum operating rates. For purposes of this permit, the maximum operating rate is defined as the 90th percentile of all daily operating rates during a 12-month period of time immediately preceding the source test.

13.b. Process and control device information to be collected during the tests include:

13.b.i. Steaming rate (lbs/hr).

13.b.ii. Residual oxygen (%).

13.b.iii. Multiclone pressure drop and the kV and mA readings for the ESP.

14. Monitoring and Recordkeeping Requirement: The permittee must inspect the multiclones and ESP on emission unit 1PH at least once annually for physical degradation that could affect the performance of the multiclones or ESP, and record the results of the inspection as well as any corrective actions or repairs required. [40 CFR Part 64]

15. Monitoring Requirement: The permittee must operate and maintain a continuous residual oxygen monitor and recorder on 1PH in accordance with the manufacturer's written instructions. [40 CFR Part 64]

15.a. Real time data must be displayed at least once every minute that the boiler is in operation. Hourly averages of the data shall be recorded once each clock hour that the boiler is in operation. Minimum data availability shall be obtained for 75 percent of the hours per day for 90 percent of the days in a calendar quarter that the boiler is operating. Monitor availability must be determined excluding periods of calibrations and routine maintenance.

15.b. The permittee must take corrective action if the residual oxygen falls below 3% for an hourly average. Corrective action must be initiated within one hour of when an excursion occurs to return the boiler to the acceptable operating level.

15.c. If the excursion lasts longer than 24 hours, the permittee must conduct daily visible emissions tests using EPA Method 9, and must notify DEQ within 48 hours of the cause and corrective actions taken and proposed.

15.d. An excursion of the residual oxygen operating action level is not necessarily a violation of the particulate matter emission standards for 1PH.

15.e. Recordkeeping: The permittee must maintain records of the residual oxygen values required by Condition 15.a, any excursions, and any corrective actions taken.

16. Monitoring Requirement: The permittee must operate and maintain a pressure gauge for measuring the pressure drop across the multiclones on 1PH in accordance with the manufacturer's written instructions. [OAR 340-218-0050(3)(a)(C)]

17. Monitoring and Recordkeeping Requirement: The permittee must maintain, operate, and record the output of a steam flow meter on emissions unit 1PH in accordance with the manufacturer's written instructions. Real time data for steam production shall be displayed at least once every minute that the boiler is in operation. Hourly averages of the data shall be recorded once each clock hour that the boiler is in operation. At a minimum, valid steam production readings shall be obtained for 75 percent of the hours per day for 90 percent of the days in a calendar quarter that the boiler is operating. Monitor availability shall be determined excluding periods of calibrations and routine maintenance. The total steam produced each day must be recorded once each day of operation. [OAR 340-218-0050(3)(a)(C)]

18. Monitoring Requirement: The permittee must operate and maintain a continuous monitoring system for measuring the voltage across and the milliamp output of the ESP on 1PH in accordance with the manufacturer's written instructions. [40 CFR Part 64]

18.a. Real time data for the voltage and milliamps must be displayed at least once every minute that the boiler is in operation. Hourly averages of the data shall be recorded once each clock hour that the boiler is in operation. Minimum data availability shall be obtained for 75 percent of the hours per day for 90 percent of the days in a calendar quarter that the boiler is operating. Monitor availability must be determined excluding periods of calibrations and routine maintenance.

18.b. The permittee shall take corrective action when the average ESP voltage is less than 14 kVDC for any 1 hour period. [OAR 340-226-0120 and 340-218-0050(3)(a)(C)]

18.c. The permittee shall take corrective action when the average ESP current in both cells is less than 20 mA for any 1 hour period. [OAR 340-226-0120(2)(b) and 340-218-0050(3)(a)(C)]

18.d. If corrective action cannot be performed within three hours, or the corrective action is ineffective, the permittee shall immediately conduct a visible emission test using modified EPA Method 9.

18.e. An action level excursion is not necessarily a violation of the particulate matter emission standard for 1PH.

18.f. Recordkeeping: The permittee must maintain records of the ESP voltage and milliamp values required by Condition 18.a, any excursions, and any corrective actions taken.

18.g. Changes in the action levels must be approved in writing by DEQ.

19. Applicable Requirement: The permittee must operate and maintain emissions unit 1PH in compliance with the applicable requirements of 40 CFR Part 63 Subpart JJJJJJ, the area source boiler rule, as detailed in Part 2 of this permit.

VENEER DRYER EMISSION UNITS, 5VD and 5VDa

Table 4 Summary of Requirements for Emissions Units 5VD and 5VDa

Applicable Requirement	Requirement Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
340-234-0510(1)(a) and (b)	20	Visible emissions	10% average opacity, 20% maximum opacity as 6 min. avg.	Quarterly VE tests	20.c

Applicable Requirement	Requirement Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
340-226-0210(2)(a)(A)	21	PM---Dryer 1	0.10 gr/dscf (avg. of 3 test runs)	RTO temperature	25
340-226-0210(2)(a)(B)	22	PM---Dryer 2	0.24/0.15 gr/dscf (avg. of 3 test runs)	RTO temperature	25
340-226-0210(2)(b)(B)	23	PM---Dryer 3	0.14 gr/dscf (avg. of 3 test runs)	RTO temperature	25
340-226-0310	24	PM	Table 1 OAR 340 Division 226	RTO temperature	25
340-234-0510(1)(e) & (g)	26.a	Air contaminant emissions	Minimize with highest and best operation	Monthly I & M	26.e
340-234-0510(1)(f)	26.b	Air contaminant emissions	Concealing emissions prohibited	Yearly I & M	26.d

Visible Emissions Standard

20. Applicable Requirement: The permittee shall not cause or allow the operation of emissions units 5VD and 5VDa such that visible air contaminants emitted from a dryer stack or emission point exceed: [OAR 340-234-0510(1)]

20.a. A daily average operating opacity of 10 percent on more than two days within any 12-month period, with the days separated from each other by at least 30 days, as measured by EPA Method 9; and [OAR 340-234-0510(1)(b)(A)]

20.b. A maximum opacity of 20 percent at any time as measured by EPA Method 9. [OAR 340-234-0510(1)(b)(B)]

20.c. Monitoring: The permittee must monitor visible emissions from emissions units 5VD and 5VDa by conducting EPA Method 9 tests at the outlet of each dryer cooling vent and on the roof vent above each dryer. The RTO outlet does not require visible emissions monitoring. [OAR 340-218-0050(3)(a)(C)]

20.c.i. The EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey on the device at the compliance demonstration point using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.

20.c.ii. The visible emissions tests on each dryer cooling vent and roof vent must be conducted at least once per quarter.

20.c.iii. If any test result exceeds the applicable standard in Condition 20.a or 20.b, the permittee must initiate corrective action within 1-hour to bring the dryer into compliance with the applicable standards. Upon completion of the corrective actions, an EPA Method 9 test must be conducted as soon as is practicable to demonstrate that the source is in compliance with the applicable standard. If the permittee observes no further exceedances during the EPA Method 9 test, the monitoring frequency can go back to the previous monitoring frequency for the monitoring point that had an exceedance.

20.c.iv. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on

the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.

20.c.v. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

20.c.vi. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys, including: date, time, observer, observations, results, and any corrective actions taken.

PM Emission Standards

21. Applicable Requirement: The permittee may not emit particulate matter emissions from Dryer #1 in emissions units 5VD and 5VDa in excess of 0.10 grains per dry standard cubic foot: [OAR 340-226-0210(2)(a)(A)]

22. Applicable Requirement: The permittee may not emit particulate matter emissions from Dryer #2 in emissions units 5VD and 5VDa in excess of the following limits: [OAR 340-226-0210(2)(a)(B)]

22.a. 0.24 grains per dry standard cubic foot until December 31, 2019; and
22.b. 0.15 grains per dry standard cubic foot on and after January 1, 2020.

23. Applicable Requirement: The permittee must not cause or allow the emissions of particulate matter in excess of 0.14 gr/dscf from Dryer #3 in emissions units 5VD and 5VDa . [OAR 340-226-0210(2)(b)(B)]

24. Applicable Requirement: The permittee must not cause, suffer, allow, or permit the emissions of particulate matter in any one hour from emissions unit 5VD in excess of the amount shown in Table 1 of OAR 340 Division 226, for the process weight allocated to that process. [OAR 340-226-0310 and -8010]

RTO Operating Requirements

25. Monitoring: The permittee shall maintain the temperature of the RTO (controlling emissions unit 5VD heated zones) at a minimum firebox temperature of 1450 °F as a 3-hour block average using a temperature monitoring device that meets the requirements of Condition 25.a. [OAR 340-226-0120)(2)(b) and 340-218-0050(3)(a)(C)]

25.a For each temperature monitoring device, the permittee must meet the requirements in Conditions 25.a.i through 25.a.vi.

25.a.i. Locate the temperature sensor in a position that provides a representative temperature.
25.a.ii. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger.
25.a.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.
25.a.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's manual. Following the electronic calibration, the

permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading.

25.a.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

25.a.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

25.b. Recordkeeping: The permittee must determine the 3-hour block average of all recorded readings and maintain a record of the averages.

25.c. The permittee may establish a different minimum firebox temperature for the RTO by submitting a written notification to DEQ and conducting a repeat performance test that demonstrates compliance with the applicable compliance options in Condition 25.d.

25.d. The RTO must achieve one of the following six options to reduce emissions from the heated zones of emissions unit 5VD:

25.d.i. Reduce emissions of total HAP, measured as THC (as carbon) (the permittee may choose to subtract methane from THC as carbon measurements), by 90 percent; or

25.d.ii. Limit emissions of total HAP, measured as THC (as carbon) (the permittee may choose to subtract methane from THC as carbon measurements), to 20 ppmvd; or

25.d.iii. Reduce methanol emissions by 90 percent; or

25.d.iv. Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the RTO are greater than or equal to 10 ppmvd; or

25.d.v. Reduce formaldehyde emissions by 90 percent; or

25.d.vi. Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the RTO are greater than or equal to 10 ppmvd.

RTO Testing

26. At least once per permit term, but no later than 18 months prior to the expiration date of this permit, the permittee shall conduct a source test for HAPs destruction efficiency to determine compliance with Condition 25 using test procedures in 40 CFR Part 63, Subpart DDDD or another method approved by DEQ. Test results shall be reported as parts per million, pounds per hour, pounds per thousand square feet of veneer dried on a 3/8" basis, and percent destruction efficiency. [OAR 340-218-0050(3)(a)(C)]

26.a. During each test run, the permittee shall record the following information:

26.a.i. Veneer dryer production for each dryer;

26.a.ii. Control device operating parameters including the RTO operating temperature and amount of natural gas combusted.

Emission Factor Verification Testing

27. Once per permit term and during one of the tests required by Condition 26, but no later than 18 months prior to the expiration date of this permit, the permittee shall conduct an emission factor verification test on

the RTO in accordance with the DEQ Source Sampling Manual for PM, CO, NOx, and VOC using DEQ Method 7 and EPA Methods 10, 7E, and 25A & 0011, respectively, or other methods approved by DEQ. [OAR 340-218-0050(3)(a)(C)]

27.a. During each test run, the permittee shall record the following information:
- 27.a.i. Veneer dryer production for each dryer;
- 27.a.ii. Visible emissions as measured by EPA Method 9 for a minimum of 6 minutes during or within 30 minutes before or after each Oregon Method 7 test run; and,
- 27.a.iii. Control device operating parameters including the RTO operating temperature and amount of natural gas combusted.

Highest and Best and Concealing Emissions

28. Applicable Requirement: The permittee shall comply with the following:

28.a. Emission unit 5VD shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. The permittee must minimize fugitive emissions from the doors of emissions unit 5VD through proper maintenance procedures and the green end of the dryers through proper balancing of the heated zone exhaust. Where effective measures are not taken to minimize fugitive emissions, DEQ may require that the equipment or structures in which processing, handling, and storage are done, be tightly closed, modified, or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the open air. [OAR 340-234-0510(1)(e) and (g)]

28.b. The permittee shall not willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission which would otherwise violate OAR 340-234-0510. [OAR 340-234-0510(1)(f)]

28c. Monitoring: At least once per quarter the permittee shall conduct an external inspection of emission unit 5VD for fugitive emissions and signs of physical degradation. Recordkeeping: Records shall be maintained of each inspection, findings, and maintenance or corrective actions taken. [OAR 340-218-0050(3)(a)(C)]

28.d. Monitoring: At least once per calendar year, the permittee shall inspect emission unit 5VD to ensure that the dryers have not been altered in such a manner that could conceal the discharge of air contaminant emissions without actually reducing emissions. Recordkeeping: Records shall be maintained of the inspections, findings, and actions taken. [OAR 340-218-0050(3)(a)(C)]

PLYWOOD PRESS EMISSION UNITS (P1, P2, P3)

Table 5 Summary of Requirements for Emissions Units P1, P2, P3

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b); 340-208-0010(4)	29	Visible emissions--- Presses 1 & 2; Press 3	20% opacity	6-minute block average	NA	33

340-226-0210(2)(a)(B)	30	PM---Presses 1 & 2	0.24/0.15 gr/dscf	Avg. of 3 test runs	NA	33
340-226-0210(2)(b)(B)	31	PM---Press 3	0.14 gr/dscf	Avg. of 3 test runs	NA	33
340-226-0310	32	PM	Table 1 OAR 340 Division 226	Avg. of 3 test runs	NA	33

29. Applicable Requirement: The permittee must not cause or allow visible emissions from emissions units P1 and P2 or P3 to equal or exceed 20 percent opacity as a six-minute block average. [OAR 340-208-0110(3)(b) or (4)]

29.a. The visible emissions standard in this condition is based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 29.a.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by:

29.a.i. EPA Method 9; or

29.a.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR Part 60; or

29.a.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9. [OAR 340-208-0110(2)]

30. Applicable Requirement: The permittee may not emit particulate matter emissions from emissions units P1 or P2 in excess of the following limits: [OAR 340-226-0210(2)(a)(B)]

30.a. 0.24 grains per dry standard cubic foot until December 31, 2019; and

30.b. 0.15 grains per dry standard cubic foot on and after January 1, 2020.

31. Applicable Requirement: The permittee must not cause or allow the emissions of particulate matter in excess of 0.14 gr/dscf from emissions unit P3 . [OAR 340-226-0210(2)(b)(B)]

32. Applicable Requirement: The permittee must not cause, suffer, allow, or permit the emissions of particulate matter in any one hour from emissions units P1, P2, or P3 in excess of the amount shown in Table 1 of OAR 340 Division 226, for the process weight allocated to that process. [OAR 340-226-0310 and -8010]

33. Monitoring Requirement: At least once per quarter, the permittee must conduct EPA Method 9 visible emissions tests on the roof vents above emissions units P1, P2, and P3. [OAR 340-218-0050(3)(a)(C)]

33.a. The EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey on the emission unit at the compliance demonstration point using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.

33.b. Should a test exceed the applicable standard, corrective action will be initiated within one (1) hour to bring the source into compliance with the applicable requirement and the monitoring frequency shall revert to weekly for a minimum of four (4) consecutive weeks. If the results of the four weekly tests are all less than the applicable standard, the test frequency may be the same as before the exceedance occurred.

33.c. If the observer is unable to conduct the tests due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or

snow, the observer shall note such conditions on the observation form and make at least three (3) attempts to conduct the tests at approximately 2-hour intervals throughout the day during daylight hours. The permittee shall attempt to make the test daily until a valid observation period is completed.

31.d. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

31.e. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys, including: date, time, observer, observations, results, and any corrective actions

OTHER EMISSION UNITS (4 CON, 1SAN, and PLY)

Table 6 Summary of Requirements for Emissions Units 4CON, 1SAN, and PLY)

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit /Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(4)	34	Visible emissions	20% opacity	6-minute block average	NA	35
340-226-0210(2)(b)(B)	36	PM---4CON &1SAN	0.14 gr/dscf	Average of 3 test runs	NA	38
340-226-0310	37	PM	Process weight	Average of 3 test runs	NA	38
340-234-510(2)(a)	38	PM	33.0 lb/hr from PLY	24 hours	NA	40

34. Applicable Requirement: The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units 4CON or 1SAN to equal or exceed 20 percent opacity as a six-minute block average, excluding uncombined water. [OAR 340-208-0110(4) and 340-208-0110(3)(a)]

34.a. The visible emissions standard in this condition is based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 34.a.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by:

34.a.i. EPA Method 9; or

34.a.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR Part 60; or

34.a.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9. [OAR 340-208-0110(2)]

35. Monitoring Requirement: At least once per quarter, the permittee must conduct EPA Method 9 visible emissions tests on emissions units 4CON and 1SAN.

35.a. The EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey on the emission unit at the compliance demonstration point using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.

35.b. Should a test exceed the applicable standard, corrective action will be initiated within one (1) hour to bring the source into compliance with the applicable requirement and the monitoring frequency shall revert to weekly for a minimum of four (4) consecutive weeks. If the results of the four weekly tests are all less than the applicable standard, the test frequency may be the same as before the exceedance occurred.

35.c. If the observer is unable to conduct the tests due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three (3) attempts to conduct the tests at approximately 2-hour intervals throughout the day during daylight hours. The permittee shall attempt to make the test daily until a valid observation period is completed.

35.d. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

35.e. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys, including: date, time, observer, observations, results, and any corrective actions

36. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in excess of 0.14 grains per dry standard cubic foot, from emissions unit 4CON and 1SAN. [OAR 340-226-0210(2)(b)(B)]

37. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in any one hour from emissions unit 4CON in excess of the amount shown in Table 1, OAR 340-226-0310, for the process weight allocated to the veneer dryers. [OAR 340-226-0310 and -8010]

38. Monitoring Requirement: The permittee must inspect the cyclones, target boxes, and baghouses of emissions unit 4CON and the sanderdust baghouse of emissions unit 1SAN at least quarterly for physical degradation that could affect the performance of the cyclones, target boxes, or baghouses, and record the results of the inspection as well as any corrective actions, bag replacements, or repairs required. [OAR 340-218-0050(3)(a)(C)]

Plywood Rule

39. The permittee must not cause or allow the emission of particulate matter (PM) emissions in excess of 43.0 pounds per hour from emissions unit PLY on a daily basis. [OAR 340-234-0510(2)(a)]

Plywood Rule Monitoring

40. The permittee must perform the following monitoring to demonstrate compliance with the limits of Condition 39. [OAR 340-234-0510(2)(c)]

40.a. The permittee must calculate the daily hourly average particulate matter emission rate from emissions unit PLY by dividing the total daily emissions from this emissions unit by the greatest number of hours that any plywood press (P1, P2, P3) operated that day. The results from these calculations will then be compared to the standard in Condition 39. The calculations for each day must be performed within 7 days of the given day; or

40.b. As an alternative to the above emission calculation monitoring, the permittee may keep daily records demonstrating that the combined production of all plywood presses (P1, P2, and P3) does not exceed 43,000 square feet per hour, 3/8 inch finished basis as a daily hourly average. The daily hourly average production values must be computed within 7 days of the given day.

40.c. Recordkeeping: Records shall be maintained of the PM calculations in Condition 40.a or the plywood production in Condition 40.b and the results compared to the standard in Condition 39 or the production value in Condition 40.b.

Gasoline Dispensing Facilities

41. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: {40 CFR 63.11116(a), (b), (d) and OAR 340-244-0240, federally enforceable]

41.a. Minimize gasoline spills;
41.b. Clean up spills as expeditiously as practicable;
41.c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
41.d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;
41.e. The permittee is not required to submit the notifications or reports as specified in 40 CFR 63.11124 and 63.11126, m or Subpart A, but the permittee must have records available within 24 hours of a request by DEQ to document gasoline throughput;
41.f. Portable gasoline containers that met the requirements of 40 CFR Part 59, subpart F, are considered acceptable for compliance with Condition 41.c.

42. In addition to the measures specified in Condition 41, the permittee must take the following measures to minimize vapor releases: [OAR 340-244-0240, state only enforceable]

42.a. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full after the nozzle clicks off (such as by checking the vehicle's fuel tank gauge), the person may continue to dispense fuel using best judgment and caution to prevent a spill;
42.b. Post a sign at the gasoline dispensing facility (GDF) instruction a person filling up a motor vehicle to not top off the vehicle tank;
42.c. Ensure that cargo tanks unloading at the GDF comply with Conditions 41.a through 41.c, 42.a, and 42.b.
42.d. The permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in OAR 340-244-0030. The submerged fill pipe must be no more than 12 inches from the bottom of the storage tank.

Insignificant Activities Requirements

43. DEQ acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:

43.a. OAR 340-208-0110 (20% opacity)
43.b. OAR 340-228-0210 (grain loading for fuel burning equipment)
43.c. OAR 340-226-0210 (grain loading for non-fugitive, non-fuel burning equipment)
43.d. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)

Unless otherwise specified in this permit or an applicable requirement, DEQ is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in and perform the testing in accordance with DEQ's Source Sampling Manual.

PLANT SITE EMISSION LIMITS

44. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12

consecutive calendar month period: [OAR 340-222-0020 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)
PM	279	25
PM_{10}	197	15
$PM_{2.5}$	103	10
NO_x	72	-0-
CO	236	-0-
SO_2	39	-0-
VOC	40	40
GHG (CO_2e)	96,800	-0-

44.a. The PSEL is based on the predicted emissions for the current operating conditions at the facility.
44.b. The annual PSELs are twelve (12) month rolling totals.

Plant Site Emission Limit Monitoring

45. The permittee shall determine compliance with the Plant Site Emission Limits established in Condition 44 of this permit by conducting monitoring in accordance with the following procedures, test methods, and frequencies in this condition and Condition 45: [OAR 340-218-0050(3)(a)(C)]

45.a. The permittee shall maintain records of the following process parameters on a monthly and annual basis:

Emissions Unit(s)/Process	Process Parameter	Units
Boiler 1PH	Steam production Hog fuel combusted	Pounds BDT
Presses P1, P2, P3	Plywood production	MM ft^2 (3/8" basis)
Log Vats VAT	Green veneer production	MM ft^2 (3/8" basis)
Veneer Dryers 5VD	Dried veneer production—Douglas Fir Dried veneer production---White Fir	MM ft^2 (3/8" basis) MM ft^2 (3/8" basis)
RTO	Natural gas usage	MM ft^3
Wood Residuals WRC	Chips sold	BDT

45.b. The permittee shall calculate pollutant mass emissions on a monthly and annual basis using the following equation, except for GHGs and VOCs from emissions unit 3ADH:

$$E = \Sigma(P_{eu} \times EF_{eu}) \times Z + AI$$

where:
E = pollutant emissions (lbs/month, tons/year);
P_{eu} = process parameters identified in Condition 45.a ;
EF_{eu} = emission factor identified for each emissions unit and pollutant in Condition 45.c;
Z = conversion constant: 1 ton/2000 lbs;
AI = 1 ton per year for PM, PM_{10}, $PM_{2.5}$, and VOC only

45.c. The emission factors for calculating pollutant emissions are as follows:

Table 7 Process Parameters

EU ID	Pollutant	Process Parameter	Units	Emission Factor	Units
1PH Hog fuel boiler	PM	Steam produced	1000 lbs	0.07	lb/1000 lb steam
	PM_{10}			0.0697	
	$PM_{2.5}$			0.0634	
	CO			0.591	
	NO_x			0.257	
	SO_2			0.014	
	VOC			0.011	
P1, P2, P3 Plywood Presses	VOC	Plywood production	MMsqft	0.07	lb/Msqft
	PM			0.2	
	PM_{10}			0.17	
	$PM_{2.5}$			0.085	
2MT Hog fuel truck unloading ramp HFR1	PM	Plywood production	MMsqft	0.168	lb/Msqft
	PM_{10}			0.124	
	$PM_{2.5}$			0.063	
2MT Hog fuel pile - fuel loader FL1	PM	Plywood production	MMsqft	0.271	lb/Msqft
	PM_{10}			0.203	
	$PM_{2.5}$			0.102	
2MT Bark conveyors BC1a,b,c,d	PM	Plywood production	MMsqft	0.007	lb/Msqft
	PM_{10}			0.005	
	$PM_{2.5}$			0.002	
2MT Chip Conveyors L1a,b,c,d	PM	Plywood production	MMsqft	0.002	lb/Msqft
	PM_{10}			0.002	
	$PM_{2.5}$			0.001	
2MT Veneer lath chip conveyors V1a,b,c,d	PM	Plywood production	MMsqft	0.003	lb/Msqft
	PM_{10}			0.002	
	$PM_{2.5}$			0.001	
2MT Hog fuel and bark bins B2	PM	Plywood production	MMsqft	0.106	lb/Msqft
	PM_{10}			0.080	
	$PM_{2.5}$			0.012	
2MT Chip loading bins B3,4,5 and pile	PM	Plywood production	MMsqft	0.248	lb/Msqft
	PM_{10}			0.185	

EU ID	Pollutant	Process Parameter	Units	Emission Factor	Units
	$PM_{2.5}$			0.028	
2MT Sanderdust truck loading bin B6	PM	Plywood production	MMsqft	0.013	lb/Msqft
	PM_{10}			0.010	
	$PM_{2.5}$			0.005	
2MT Sawdust truck loading bin B7	PM	Plywood production	MMsqft	0.026	lb/Msqft
	PM_{10}			0.019	
	$PM_{2.5}$			0.010	
2MT Ply trim truck loading bin B8	PM	Plywood production	MMsqft	0.085	lb/Msqft
	PM_{10}			0.064	
	$PM_{2.5}$			0.032	
4CON Target Box #1	PM	Plywood production	MMsqft	0.034	lb/Msqft
	PM_{10}			0.026	
	$PM_{2.5}$			0.013	
4CONTarget Box #2	PM	Plywood production	MMsqft	0.049	lb/Msqft
	PM_{10}			0.036	
	$PM_{2.5}$			0.018	
4CONTarget Box #3	PM	Plywood production	MMsqft	0.049	lb/Msqft
	PM_{10}			0.036	
	$PM_{2.5}$			0.018	
4CON Cyclone #1	PM	Plywood production	MMsqft	0.027	lb/Msqft
	PM_{10}			0.022	
	$PM_{2.5}$			0.012	
4CON Cyclone #2	PM	Plywood production	MMsqft	0.038	lb/Msqft
	PM_{10}			0.033	
	$PM_{2.5}$			0.016	
4CON Cyclone #3	PM	Plywood production	MMsqft	0.074	lb/Msqft
	PM_{10}			0.064	
	$PM_{2.5}$			0.032	
4CON Cyclone #4	PM	Plywood production	MMsqft	0.178	lb/Msqft
	PM_{10}			0.151	
	$PM_{2.5}$			0.076	
4CON Cyclone #5	PM	Plywood production	MMsqft	0.323	lb/Msqft
	PM_{10}			0.274	
	$PM_{2.5}$			0.137	

EU ID	Pollutant	Process Parameter	Units	Emission Factor	Units
4CON Glue Mixer exhaust fan F8	PM	Plywood production	MMsqft	0.013	lb/Msqft
	PM_{10}			0.013	
	$PM_{2.5}$			0.006	
4CON Sanderdust cyclone/baghouse	PM	Plywood production	MMsqft	0.034	lb/Msqft
	PM_{10}			0.033	
	$PM_{2.5}$			0.033	
4CON Ply trim cyclone/baghouse	PM	Plywood production	MMsqft	0.033	lb/Msqft
	PM_{10}			0.032	
	$PM_{2.5}$			0.032	
4CON Open blow pipe BP1	PM	Plywood production	MMsqft	0.069	lb/Msqft
	PM_{10}			0.052	
	$PM_{2.5}$			0.007	
5VD Veneer dryer RTO	PM	Veneer dried	MMsqft	0.025	lb/Msqft
	PM_{10}			0.025	
	$PM_{2.5}$			0.025	
	CO			0.73	
	NO_x			0.004	
	VOC			0.02	
	SO_2	Natural gas	$MMft^3$	1.7	$lb/MMft^3$
5VDa Veneer dryer fugitives	PM	Veneer dried	MMsqft	0.10-Doug fir 0.03 –white fir	lb/Msqft
	PM_{10}			0.10-Doug fir 0.03 –white fir	
	$PM_{2.5}$			0.10-Doug fir 0.03 –white fir	
	VOC			0.036	
5VD Veneer dryer cooling zones	VOC	Veneer dried	MMsqft	0.054	lb/Msqft
VAT Log vats	VOC	Green veneer produced	MMsqft	0.0744	lb/Msqft
WRC Wood residuals chips	VOC	Chips sold	BDT	0.05	lb/BDT
6WE Paved roads	PM	Plywood production	MMsqft	0.57	lb/Msqft
	PM_{10}			0.11	

EU ID	Pollutant	Process Parameter	Units	Emission Factor	Units
	$PM_{2.5}$			0.028	

46. The emissions factors listed in Condition 45.c are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 45.b of this permit using the measured process parameters recorded during the reporting period and the emission factors contained in Condition 45.c. [OAR 340-218-0050(3)(a)(C)]

47. The permittee shall monitor and calculate the contribution from emissions unit 3ADH to the annual VOC PSEL established in Condition 44 using the following calculations: [OAR 340-218-0050(3)(a)(C)]

47.a. The permittee shall maintain records of the amount of materials used at emissions unit 3ADH for each month.

47.b. The VOC content of the materials shall be determined by material safety data sheets or supplier technical bulletins. If a range of VOC content is given, the maximum of the range shall be used to calculate emissions.

47.c. Emissions from emissions unit 3ADH shall be monitored using the following equation:

$$V = \%V_u \times M_u \times D$$

where:

V =	volatile organic compounds emissions, lbs/month;
$\%V_u$ =	percent VOC of material used in the process, wt/wt;
M_u =	material used in the process, gallons/month; and
D =	density of material used in process, lb/gallon.

47.d. The annual VOC emissions calculated using material balance shall be added to the VOC emissions calculated in Condition 45.b for monitoring compliance with the facility-wide VOC PSEL in Condition 44.

48. Monthly calculations shall be completed within 30 days of the end of each month and annual calculations shall be completed by February 15 of each year this permit is in effect. [OAR 340-218-0050(3)(a)(C)]

EMISSION FEES

49. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [OAR 340-220-0090]

TESTING REQUIREMENTS

50. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120(3)]

50.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. Permittee should be aware, if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.

50.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.

50.c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:

50.c.i. At least 90% of the design capacity for new or modified equipment;

50.c.ii. At least 90% of the maximum operating rate for existing equipment; or

50.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.

50.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

50.e. Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ within 60 days of completing any required source test, unless a different time period is approved in the source test plan.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

51. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]

52. The permittee must use the same methods to determine compliance as those used to determine actual emissions for fee purposes and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]

53. The permittee must comply with the monitoring requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

General Recordkeeping Requirements

54. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]

54.a. The date, place as defined in the permit, and time of sampling or measurements;

54.b. The date(s) analyses were performed;

54.c. The company or entity that performed the analyses;

54.d. The analytical techniques or methods used;

54.e. The results of such analyses;

54.f. The operating conditions as existing at the time of sampling or measurement; and

54.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).

55. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10%

of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-214-0114, and 340-218-0050(3)(b)]

56. The permittee must comply with the recordkeeping requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]

57. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(3)(b)(B)]

Source Specific Recordkeeping Requirements

58. The permittee shall maintain the following specific records of required monitoring information that include the following: [OAR 340-218-0050(3)(b)(A)]

- 58.a. quarterly records of visible emission surveys for facility fugitive emissions (Condition 8.b);
- 58.b. complaint log and investigation reports (Condition 8.a);
- 58.c. visible emissions survey/observation reports for emissions units 1PH, 2MT, 4CON, 5VD, 5VDa, and 1SAN;
- 58.d. hourly, monthly, and annual records of steam production rates (Condition 17);
- 58.e. records of inspection and maintenance procedures for emissions unit 5VD (Condition 28);
- 58.f. records of inspection and maintenance procedures for emissions units 4CON and 1SAN (Condition 38);
- 58.g. daily, monthly, and annual records of plywood production (MSF, 3/8" basis) (Conditions 40 and 45.a);
- 58.h. daily, monthly, and annual records of veneer dried, type and species (MSF, 3/8" basis) (Conditions 40 and 45.a);
- 58.i. daily, monthly, and annual records of green veneer produced , type and species (MSF, 3/8" basis) (Condition 45.a);
- 58.j. monthly and annual records of hog fuel combusted (Condition 45.a);
- 58.k. monthly and annual records of chip shipments (Condition 45.a);
- 58.l. monthly and annual records of VOC materials used in emissions unit 3ADH (Condition 47);
- 58.m. occurrence and length of downtime for all pollution control devices;
- 58.n. pollutant emissions (daily, monthly, annual) (Condition 40 and 45.a); and
- 58.o. excess emissions log (Condition 59).

Note: Annual records are for any twelve consecutive calendar month period.

REPORTING REQUIREMENTS

General Reporting Requirements

59. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
    - 59.a. Immediately (by 9:00 am on the day following the event) notify DEQ of an excess emission event by phone, email, or facsimile; and
    - 59.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]

59.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
59.b.ii. The date and time the permittee notified DEQ of the event;
59.b.iii. The equipment involved;
59.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
59.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
59.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
59.b.vii. The final resolution of the cause of the excess emissions; and
59.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.

59.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.

59.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by DEQ in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.

59.e. The permittee must notify DEQ of planned startup/shutdown or scheduled maintenance events.

59.f. The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-214-0340(4)(a)]

60. Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 59. [OAR 340-218-0050(3)(c) (B)]

61. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]

62. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

Submit all Notices and applications that do not include payment to the Western Region Permit Coordinator.

Submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Western Region. If you know the name of the Air Quality staff member responsible for your permit, please include it.

Western Region Office
4026 Fairview Industrial Drive SE
Salem, OR 97302
503-378-8240

Submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

DEQ – Air Quality Division
700 NE Multnomah St., Suite 600
Portland, OR 97232
503-229-5263

Submit all reports for EPA requirements to:

Air Operating Permits
US Environmental Protection Agency
Mail Stop OAQ-108
1200 Sixth Avenue
Seattle, WA 98101

Semi-annual and Annual Reports

63. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the DEQ regional office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]

63.a. The first semi-annual report is be due on August 15 and must include the semi-annual compliance certification. [OAR 340-218-0050(3)(c)(A)(i)]

63.b. The annual report is due on February 15 and must consist of the following: [OAR 340-218-0050(3)(c)(A)(ii)]

63.b.i. The emission fee report (F1101 and F1102) [OAR 340-220-0100]

63.b.ii. A summary of the excess emissions upset log [OAR 340-214-0340]

63.b.iii. The second semi-annual compliance certification (R1002 and R1003 if there are permit deviations) [OAR 340-218-0050(3)(c)(A)(i)]]

63.b.iv. The annual emission inventory report for the prior calendar year (R1001) [OAR 340-218-0050(3)(a)(C)].

64. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]

64.a. The identification of each term or condition of the permit that is the basis of the certification;

64.b. The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the permittee must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;

64.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 64.b of this permit. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and

64.d. Such other facts as DEQ may require to determine the compliance status of the source.

65. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO2e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR Chapter 340, Division 215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0030(2)(b) and -0040(1)]

66. Notwithstanding any other provision contained in any applicable requirement, the permittee may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

NON-APPLICABLE REQUIREMENTS

67. The following State and Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110(1)(b)]

Oregon Administrative Rules, Chapter 340

Applicable Requirement	Section	Reason Code	Applicable Requirement	Section	Reason Code
Division 202	All rules	I	Division 230	All rules	E
Division 204	All rules	I	Division 232	All rules	C
Division 206	0050 0060 through 0070	C I	Division 234	0100 through 0270, 0520 and 0530	B
Division 208	0500 through 0610	D	Division 236	All rules	B
Division 210	0100 through 0120	B	Division 238 Division 240	0060 through 0100 All rules	E C
Division 214	0200 through 0220	C	Division 242	All rules	C
Division 218	0050(4)	B	Division 244	0100, 0232 through 0252	H E
	0060	I	Division 248	0210 through 0230	B
	0070	I	Division 250	All rules	I
	0090	B	Division 252	All rules	I
	0100	B	Division 253	All rules	B
Division 222	0042	H	Division 254	All rules	E
	0060	H	Division 256	All rules	B
Division 223	All rules	B	Division 257	All rules	E
Division 224	0045 through 0060	C	Division 258	All rules	B
	0245 through 0260	C	Division 259	All rules	I
Division 225	0045	C	Division 260	All rules	B
Division 226	0400	H	Division 262	All rules	B
Division 228	0100 through 0130	F	Division 264	0100 through 0160,	D
	0200	E		0175	D
	0300	B	Division 266	All rules	B
	0600 through 0639	B			

Federal Rules, 40 CFR

Applicable Requirement	Section	Reason Code
Part 55	All rules	B
Part 57	All rules	B
Part 60	All rules except subpart A and appendices	B
Part 61	All rules except subparts A and M and appendices	B
Part 63	All rules except subparts A, JJJJJJ, and appendices	B
Part 68	All rules	B
Parts 72 through 78	All rules	B
Part 82	All rules except subpart F	B
Parts 85 through 89	All rules	B

Reason code definitions:

A this pollutant is not emitted by the facility
B the facility is not in this source category
C the facility is not in a special control area
D the facility is not in this county
E the facility does not have this emissions unit
F the facility does not use this fuel type
G the rule does not apply because no changes have been made at the facility that would trigger these procedural requirements
H this method/procedure is not used by the facility
I this rule applies only to DEQ and regional authorities
J there are no emissions units with add-on control devices or the pre-controlled potential emissions are less than 100 tons per year or the emissions units with add-on control devices and pre-controlled emissions greater than 100 tons per year are subject to emissions standards promulgated after November of 1990

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in this permit have the meaning assigned to such terms in the referenced regulation.

G2. Reference materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in this permit:

a. Source Sampling Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A4;
b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

a. The permittee must comply with all conditions of this permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400] This condition is enforceable only by the State.

G6. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G7. Certification [OAR 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to DEQ or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to DEQ a material error or omission in these records, reports, plans, or other documents.

G8. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0180.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0290]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

a. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:

   i. Such applicable requirements are included and are specifically identified in the permit, or
   ii. DEQ, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

b. Nothing in this rule or in any federal operating permit alters or affects the following:

   i. The provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of DEQ);
   ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
   iii. The applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
   iv. The ability of DEQ to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).

c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by DEQ.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow DEQ, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

a. Enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;

c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
d. As authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to the Department of Environmental Quality, Financial Services, 700 NE Multnomah St., Suite 600, Portland, OR 97232, within 30 days of date DEQ mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to DEQ. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

a. The permittee must monitor for, and record, any off-permit change to the source that:

i. Is not addressed or prohibited by the permit;
ii. Is not a Title I modification;
iii. Is not subject to any requirements under Title IV of the FCAA;
iv. Meets all applicable requirements;
v. Does not violate any existing permit term or condition; and
vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.

b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ and the EPA.
c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
d. The permit shield of Condition G11 does not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:

i. Violate an applicable requirement;
ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
iii. Be a Title I modification.

b. A minimum 7-day advance notification must be submitted to DEQ and the EPA in accordance with OAR 340-218-0140(3)(b).
c. The permit shield of Condition G11 does not extend to section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
b. Sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170(2)(a).

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180.

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from DEQ prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0205 through OAR 340-210-0250.

G21. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) from DEQ and having satisfied the requirements of OAR 340, Division 224.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to DEQ, within a reasonable time, any information that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to DEQ copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by DEQ.

b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ must provide no less than six (6) months for the owner or operator to prepare an application.
c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights [OAR 340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

G29. Permit Availability [OAR 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to DEQ or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Western Region
221 Stewart Ave., Suite 201
Medford, OR 97501
(541) 776-6010

OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE V OPERATING PERMIT
Part 2 of 2

Western Region
4026 Fairview Industrial Drive
Salem, OR 97302
Telephone (503) 378-8240

Issued in accordance with the provision of
ORS 468A.040 and based on the land use compatibility fmdings included in the permit record.

ISSUED TO:

Swanson Group Mfg. LLC
P.O. Box 250
Glendale, OR 97442

PLANT SITE LOCATION:

303 Mehlwood Lane
Glendale, OR 97442

INFORMATION RELIED UPON:

Application Number: 27408
Received: 7/2/2013

LAND USE COMPATIBILITY STATEMENT:

Issued by: Douglas County Planning
Dated: 06/05/96

ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY

Claudia Davis, Western Region Air Quality Manager

JUN 12 2017
Date

Nature of Business:	SIC	NAICS
Plywood Manufacturer	2436	321212
Fuel Burning Equipment	4961	221330

RESPONSIBLE OFFICIAL

Title: Vice President of Manufacturing

FACILITY CONTACT PERSON

Name: Jay Yates
Title: Corporate Steam Systems Manager
Phone: (541) 731-0461

Area Sources NESHAP for Industrial, Commercial, and Institutional Boilers

(40 CFR Part 63 Subpart JJJJJJ)

1. Compliance dates. [40 CFR 63.11196]

   1.a For an existing affected boiler, the permittee must achieve compliance with the applicable provisions in the NESHAP as follows: [40 CFR 63.11196(a)]

      1.a.i If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, the permittee must achieve compliance with the work practice or management standard no later than March 21, 2014. [40 CFR 63.11196(a)(1)]

      1.a.ii If the existing affected boiler is subject to the energy assessment requirement, the permittee must achieve compliance with the energy assessment requirement no later than March 21, 2014. [40 CFR 63.11196(a)(3)]

Emission Limits, Work Practice Standards, Emission Reduction Measures, and Management Practices

2. Standards. [40 CFR 63.11201]

   2.a The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 that applies to the boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [40 CFR 63.11201(b)]

   2.b These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in 40 CFR 63.11237, during which time the permittee must comply only with Table 2. [40 CFR 63.11201(d)]

General Compliance Requirements

3. General requirements for complying with the NESHAP. [40 CFR 63.11205]

   3.a At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the NESHAP have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11205(a)]

Initial Compliance Requirements

4. Initial compliance requirements. [40 CFR 63.11210]

   4.a For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, the permittee must demonstrate initial compliance no later than the compliance date that is specified in Condition 1. [40 CFR 63.11210(c)]

5. Demonstrating initial compliance with the work practice standards, emission reduction measures, and management practices. [40 CFR 63.11214]

5.a For an existing biomass-fired boiler, the permittee must conduct a performance tune-up according to Condition 6.b and must submit a signed statement in the Notification of Compliance Status report that indicates that a tune-up of the boiler was conducted. [40 CFR 63.11214(b)]

5.b For an existing affected boiler with a heat input capacity of 10 MMBtu/hr or greater, the permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 and is an accurate depiction of the facility. [40 CFR 63.11214(c)]

Continuous Compliance Requirements

6. Demonstrating continuous compliance with the work practice and management practice standards. [40 CFR 63.11223]

6.a For affected sources subject to the work practice standard or the management practices of a tune-up, the permittee must conduct a performance tune-up according to Condition 6.b and keep records as required in Condition 7.b to demonstrate continuous compliance. The permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [40 CFR 63.11223(a)]

6.b The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance in accordance with Conditions 6.b.i through 6.b.vii. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. [40 CFR 63.11223(b)]

6.b.i As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [40 CFR 63.11223(b)(1)]

6.b.ii Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [40 CFR 63.11223(b)(2)]

6.b.iii Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [40 CFR 63.11223(b)(3)]

6.b.iv Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [40 CFR 63.11223(b)(4)]

6.b.v Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.11223(b)(5)]

6.b.vi Maintain on-site and submit, if requested by DEQ, A report containing the following information: [40 CFR 63.11223(b)(6)]

6.b.vi.(1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [40 CFR 63.11223(b)(6)(i)]

6.b.vi.(2) A description of any corrective actions taken as a part of the tune-up of the boiler. [40 CFR 63.11223(b)(6)(ii)]

6.b.vi.(3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 CFR 63.11223(b)(6)(iii)]

6.b.vii If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 CFR 63.11223(b)(7)]

7. Notification, reporting, and recordkeeping requirements. [40 CFR 63.11225]

7.a For boilers that are subject only to a requirement to conduct a biennial tune-up according to Condition 6.a and not subject to emission limits or operating limits, the permittee may prepare a biennial compliance report as follows: [40 CFR 63.11225(b)]

7.a.i Company name and address. [40 CFR 63.11225(b)(1)]

7.a.ii Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the NESHAP. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [40 CFR 63.11225(b)(2)]

7.a.ii.(1) "This facility complies with the requirements in Condition 6 to conduct a biennial tune-up of each boiler." [40 CFR 63.11225(b)(2)(i)]

7.a.ii.(2) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit." [40 CFR 63.11225(b)(2)(ii)]

7.a.ii.(3) "This facility complies with the requirement in Condition 3 to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available." [40 CFR 63.11225(b)(2)(iii)]

7.a.iii If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [40 CFR 63.11225(b)(3)]

7.b The permittee must maintain the following records: [40 CFR 63.11225(c)]

7.b.i The permittee must keep a copy of each notification and report that was submitted to comply with the NESHAP and all documentation supporting any submitted Initial Notification or Notification of Compliance Status. [40 CFR 63.10(b)(2)(xiv) and 63.11225(c)(1)]

7.b.ii The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by Conditions 5 and 6 as follows. [40 CFR 63.11225(c)(2)]

7.b.ii.(1) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [40 CFR 63.11225(c)(2)(i)]

7.b.ii.(2) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If

combusting a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a nou-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a). [40 CFR 63.11225(c)(2)(ii)]

7.b.ii.(3) For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report. [40 CFR 63.11225(c)(2)(iii)]

7.b.iii Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [40 CFR 63.11225(c)(4)]

7.b.iv Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Condition 3.a, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [40 CFR 63.11225(c)(5)]

7.c Records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. [40 CFR 63.11225(d)]

Tables to 40 CFR Part 63 Subpart JJJJJJ
(Tables 1 and 3-7 of the NESHAP do not apply to this facility)

Table 2 - Work Practice Standards, Emission Reduction Measures, and Management Practices

If the boiler is in this subcategory...	The permittee must meet the following...
1. New or existing coal-fired, new biomass-fired, or new oil-fired boilers (units with heat input capacity of 10 MMBtu/hr or greater)	Minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. If manufacturer's recommended procedures are not available, the permittee must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.
2. Existing biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in Condition 5, and conduct a tune-up of the boiler biennially as specified in Condition 6.
3. Existing coal-fired, biomass-fired, or oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment

	requirement. The energy assessment must include the following with extent of the evaluation for items a) to d) appropriate for the on-site technical hours listed in 40 CFR 63.11237: a. A visual inspection of the boiler system. b. An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints. c. An inventory of major energy use systems consuming energy from affected boiler(s) and which are under the control of the boiler owner/operator. d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage. e. A list of major energy conservation measures that are within the facility's control. f. A list of the energy savings potential of the energy conservation measures identified. g. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.